REMARKS

In the following, the Examiner's comments, when included, are presented in bold, indented type, followed by the Applicants' remarks.

Claim Rejections – 35 USC § 102

1. The following is a quotation of the appropriate paragraphs of 35 U.S.C. 102 that form the basis for the rejections under this section made in this Office action:

A person shall be entitled to a patent unless-

- (b) the invention was patented or described in a printed publication in this or a foreign country or in public use or on sale in this country, more than one year prior to the date of application for patent in the United States.
- 2. Claims 1-23 are rejected under 35 U.S.C. 102(b) as being anticipated by Chen et al., (U.S. Patent No. 5,930,795 and hereinafter referred to as Chen).

As to claims 1, 4, 7, 9, 11, 14, 17, 19 and 21, Chen teaches a method for processing a trigger associated with a subject table in a relational database, wherein the trigger defines a triggering statement and one or more triggered actions, the method including: determining that a triggering statement of a trigger will execute on a subject table row of a subject table (col 5, lines 50-54, lines 60-67; col 12, lines 25-67; col 13, lines 1-5; col 14, lines 8-50); requesting a transition table in response to determining that the triggering statement will execute, the transition table including a transition table row, where in the transition table row comprises a first value associated with the subject table row and a second value associated with the subject table row (col 5, lines 50-54, lines 60-67; col 12, lines 25-67; col 13, lines 1-5; col 14, lines 8-50); reading the transition table row from the transition table (col 5, lines 50-54, lines 60-67; col 12, lines 25-67; col 13, lines 1-5; col 14, lines 8-50); identifying a processing unit to receive the transition table row and a triggered action of the trigger; and transmitting the transition table row and the triggered action to the identified processing unit to be processed...

Applicants respectfully disagree. The cited sections of Chen describe techniques for referencing, in the body of coded triggers, table values that are not known at compile-

time (col. 3, lines 23-27; col. 5, lines 59-63); making data stored in a database management system (DBMS) accessible to external host language code (col. 5, lines 63-67); and creating transition tables in response to a trigger statement (col. 12, lines 25-67; col. 13, lines 1-5). Additionally, the cited sections of Chen provide example code for implementing these described techniques (col. 14, lines 8-50).

The cited portions, however, do not disclose "identifying a processing unit to receive the transition table row and a triggered action of the trigger based on an association between the processing unit and a portion of memory" as required by Claim 1. In addressing original Claim 1, the Examiner asserts that "Chen teaches…a method including…identifying a processing unit to receive the transition table row and a triggered action of the trigger; and transmitting the transition table row and the triggered action to the identified processing unit to be processed" because:

...in a parallel processing environment, the different processors process different activities; for a particular job a processor has to be identified to perform the job...col 5, lines 50-54, lines 60-67; col 12, lines 25-67; col 13, lines 1-5; col 14, lines 8-50...

Applicants respectfully dispute this assertion. Nonetheless, even assuming for the sake of argument that this assertion is correct, Applicants respectfully note that Chen fails to disclose "identifying a processing unit to receive the transition table row and a triggered action of the trigger based on an association between the processing unit and a portion of memory" as required by amended Claim 1.

As a result, Chen fails to recite, either expressly or inherently, every element of amended Claim 1. Claim 1 is thus allowable for at least these reasons. Accordingly, Applicants respectfully request that the rejection of Claim 1 be withdrawn.

As to claims 2-3, 5-6, 8, 10, 12-13, 15-16, 18, 20 and 22 and 23, the limitations of these claims are either addressed or rejected in the claim above.

Applicants respectfully disagree. Claims 2 and 3 depend from Claim 1 and are thus patentable for at least the same reasons as those described above for claim 1.

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Additionally, Claims 2 and 3 include additional elements beyond those included in Claim 1. "All words in a claim must be considered in judging the patentability of that claim against the prior art." M.P.E.P. § 2143.03 (citing In re Wilson, 424 F.2d 1382, 165 U.S.P.Q. 494, 496 (C.C.P.A. 1970)). Applicants respectfully note that the Examiner has not addressed the additional limitations of Claims 2 and 3. For at least these reasons, Applicants respectfully request that the rejection of Claims 2 and 3 be withdrawn.

Similarly, Applicants respectfully note that the Examiner fails to specifically address the individual limitations of Claim 4, instead basing the rejection of Claim 4 on the language of Claim 1. Again, Applicants respectfully note that "[a]ll words in a claim must be considered in judging the patentability of that claim against the prior art." M.P.E.P. § 2143.03. Moreover, Chen fails to recite, expressly or inherently, every element of Claim 4. As one example, Chen fails to disclose "instructing a first processing unit, in response to determining that the triggering statement of the trigger will execute, to communicate a transition table row to a second processing unit, wherein the transition table row comprises at least one value associated with the subject table row" as recited by Claim 4. Claim 4 is thus allowable for at least this reason. Accordingly, Applicants respectfully request that the rejection of Claim 4 be withdrawn.

Claims 5 and 6 depend from independent Claim 4 and are thus allowable for at least the same reasons as independent Claim 4. Accordingly, Applicants respectfully request that the rejection of Claims 5 and 6 be withdrawn.

Applicants respectfully note that the Examiner also fails to specifically address the individual limitations of Claim 7, instead basing the rejection of Claim 7 on the language of Claim 1. Moreover, Chen fails to recite, expressly or inherently, every element of Claim 7. As one example, Chen fails to disclose "receiving a triggering statement of a trigger to be executed on a subject table row of a subject table and **information identifying a processing unit**" as recited by Claim 7. Claim 7 is thus allowable for at least this reason. Accordingly, Applicants respectfully request that the rejection of Claim 7 be withdrawn.

Claim 8 depends from independent Claim 7 and is thus allowable for at least the same reasons as independent Claim 7. Accordingly, Applicants respectfully request that the rejection of Claim 8 be withdrawn.

Applicants respectfully note that the Examiner also fails to specifically address the individual limitations of Claim 9, instead basing the rejection of Claim 9 on the language of Claim 1. Moreover, Chen fails to recite, expressly or inherently, every element of Claim 9. As one example, Chen fails to disclose "receiving a triggered action of a trigger associated with a subject table and **information identifying the transition table row**" as recited by Claim 9. Claim 9 is thus allowable for at least this reason. Accordingly, Applicants respectfully request that the rejection of Claim 9 be withdrawn.

Claim 10 depends from independent Claim 9 and is thus allowable for at least the same reasons as independent Claim 9. Accordingly, Applicants respectfully request that the rejection of Claim 10 be withdrawn.

Applicants respectfully note that the Examiner also fails to specifically address the individual limitations of Claim 11, instead basing the rejection of Claim 11 on the language of Claim 1. Moreover, Chen fails to recite, expressly or inherently, every element of Claim 11. For example, as noted above with respect to Claim 1, Chen fails to disclose "identify[ing] a processing unit to receive the transition table row and a triggered action of the trigger based on an association between the identified processing unit and a portion of memory." As a result, Chen also fails to disclose "[a] computer program...including executable instructions that cause a computer to...identify a processing unit to receive the transition table row and a triggered action of the trigger based on an association between the identified processing unit and a portion of memory" as recited by amended Claim 11.

Claims 12 and 13 depend from independent Claim 11 and are thus allowable for at least the same reasons as independent Claim 11. Accordingly, Applicants respectfully request that the rejection of Claims 12 and 13 be withdrawn.

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Applicants respectfully note that the Examiner also fails to specifically address the individual limitations of Claim 14, instead basing the rejection of Claim 14 on the language of Claim 1. Moreover, Chen fails to recite, expressly or inherently, every element of Claim 14. As one example, as noted above with respect to Claim 4, Chen fails to disclose "instruct[ing] a first processing unit, in response to determining that the triggering statement of the trigger will execute, to communicate a transition table row to a second processing unit, wherein the transition table row comprises at least one value associated with the subject table row." As a result, Chen also fails to disclose "[a] computer program...including executable instructions that cause a computer to...instruct a first processing unit, in response to determining that the triggering statement of the trigger will execute, to communicate a transition table row to a second processing unit, wherein the transition table row comprises at least one value associated with the subject table row" as recited by Claim 14. Claim 14 is thus allowable for at least this reason. Accordingly, Applicants respectfully request that the rejection of Claim 14 be withdrawn.

Claims 15 and 16 depend from independent Claim 14 and are thus allowable for at least the same reasons as independent Claim 14. Accordingly, Applicants respectfully request that the rejection of Claims 15 and 16 be withdrawn.

Applicants respectfully note that the Examiner also fails to specifically address the individual limitations of Claim 17, instead basing the rejection of Claim 17 on the language of Claim 1. Moreover, Chen fails to recite, expressly or inherently, every element of Claim 17. As one example, as noted above with respect to Claim 7, Chen fails to disclose "receiv[ing] a triggering statement of a trigger to be executed on a subject table row of a subject table and **information identifying a processing unit**." As a result, Chen also fails to disclose "[a] computer program...including executable instructions that cause a computer to...receive a triggering statement of a trigger to be executed on a subject table row of a subject table and information identifying a processing unit" as recited by Claim 17. Claim 17 is thus allowable for at least this reason. Accordingly, Applicants respectfully request that the rejection of Claim 17 be withdrawn.

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Claim 18 depends from independent Claim 17 and is thus allowable for at least the same reasons as independent Claim 17. Accordingly, Applicants respectfully request that the rejection of Claim 18 be withdrawn.

Applicants respectfully note that the Examiner also fails to specifically address the individual limitations of Claim 19, instead basing the rejection of Claim 19 on the language of Claim 1. Moreover, Chen fails to recite, expressly or inherently, every element of Claim 19. As one example, as noted above with respect to Claim 9, Chen fails to disclose "receiv[ing] a triggered action of a trigger associated with a subject table and **information identifying the transition table row**." As a result, Chen also fails to disclose "[a] computer program...including executable instructions that cause a computer to...receive a triggered action of a trigger associated with a subject table and information identifying the transition table row" as recited by Claim 19. Claim 19 is thus allowable for at least this reason. Accordingly, Applicants respectfully request that the rejection of Claim 19 be withdrawn.

Claim 20 depends from independent Claim 19 and is thus allowable for at least the same reasons as independent Claim 19. Accordingly, Applicants respectfully request that the rejection of Claim 20 be withdrawn.

Applicants respectfully note that the Examiner also fails to specifically address the individual limitations of Claim 21, instead basing the rejection of Claim 21 on the language of Claim 1. Moreover, Chen fails to recite, expressly or inherently, every element of Claim 21. For example, Chen fails to disclose "[a] process including... identifying a CPU to receive the transition table row and a triggered action of the trigger based on a data storage facility to which the identified CPU provides access" as recited by Claim 21. Claim 21 is thus allowable for at least this reason. Accordingly, Applicants respectfully request that the rejection of Claim 21 be withdrawn.

Claims 22 and 23 depend from independent Claim 21 and are thus allowable for at least the same reasons as independent Claim 21. Accordingly, Applicants respectfully request that the rejection of Claims 22 and 23 be withdrawn.

New Claims

Applicants add new Claims 24-26, which are fully supported by the Application as originally filed. Claim 24 depends from Claim 1, Claim 25 depends from Claim 11, and Claim 26 depends from Claim 21. Claims 24, 25, and 26 are thus allowable for at least the same reasons as Claims 1, 11, and 21, respectively. Accordingly, Applicants respectfully request consideration and full allowance of new Claims 24-26.

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SUMMARY

Applicants contend that the claims are in condition for allowance, which action is requested. Applicants request that any fees associated with the filing of this response be debited from deposit account number 14-0225, Order Number 069092.0183.

Respectfully submitted,

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